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DATE:	3116/93 F	ROM: KOSOWSKI
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	BUCKS CO. HEALTH	
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LETTER IN REFERENCE TO:

SPRAY PRÖDUCTS CORP. P.O. BOX 737 NORRISTOWN, PA 19404

215 - 277-1010

AIRMAIL FIRST CLASS MAIL INTER-OFFICE

MR. BRIAN KOSOWSKI MAR 0 9 1993

CONSHOHOCKEN, PA 19428

HOW TO USE THIS

DAY/TIMER

LITTLE TO SAVE TIME.

Type or write your reply in the space below. Then mail the white copy to us and keep the pink copy for your files.

You'll save time and effort, and we'll have your onswer

much faster! Thank you.

MESSAGE

DATE: 3/8/93

DEAR MR. KOSOWSKI:

AS REQUESTED, WE ARE ENCLOSING A "5085EQUENT NOTIFICATION OF REGULATED WASTE ACTIVITY" (FORM 8700-12) ALONG WITH THE PA. DEPT. OF ENVIRONMENTAL RESOURCES SUPPLEMENT FORM (ER -WM-53: 7/86). YOU WILL NOTE THAT WE HAVE NOT STORED HAZARDOUS WASTE ON OUR PROPERTY SINCE AUGUST, 1983 AT WHICH TIME BOTH PADER AND USEPA WERE NOTIFIED.

HOPEFULLY, THIS WILL GET OUR FACILITY REMOVED

FROM THE USEPA DATA BASE WHICH LISTS US A TSD

FACILITY,

SINCERELY

SINCERELY SPRAY PROBUCTS CORP. ANDREW A. ORR, PRESIDENT

REPLY

DATE:

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

&EPA

Notification of Regulated Waste Activity

Date Received (For Official Use Only)

United States Environmental Protection Agency

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		D - For Official Use Only
VIII. Type of Regulated Waste Activity		
A. Hazardous	Waste Activity	B. Used Oil Fuel Activities
1. Generator (See Instructions) a. Greater than 1000kg/mo (2,200 lbs) b. 100 to 1000 kg/mo (220 - 2,200 lbs) c. Less than 100 kg/mo (220 lbs.) 2. Transporter (Indicate Mode in boxes 1 a. For own waste only b. For commercial purposes Mode of Transportation 1. Air 2. Rail 3. Highway 4. Water 5. Other - specify	4. Hazardous Waste Fuel a. Generator Marketing to	Diff-Specification Used Oil Fuel
IX. Description of Regulated Wastes (L	Jse additional sheets if necessary)	>
wastes your installation handles. (See 40 4. T 1. Ignitable 2. Corrosive 3. Reactive C	CFR Parts 261.20 - 261.24) Oxicity heracteristic	nding to the characteristics of nonlisted hazardous
B. Listed Hazardous Wastes. (See 40 CFR	261.31 - 33. See instructions if you need	to list more than 12 waste codes.)
1 2 F003 7 8	3 4 10 10 10	5 6 11 12 12 12
C. Other Wastes. (State or other wastes requ	uiring a handler to have an I.D. number.	See instructions.)
1 2	3 4	5 6
X. Certification		
accordance with a system designed to submitted. Based on my inquiry of the p gathering the information, the informa	to assure that qualified personnel person or persons who manage the station submitted is, to the best of inflicant penalties for submitting false. Name and Official Title (type or pringer)	prepared under my direction or supervision in properly gather and evaluate the information ystem, or those persons directly responsible for my knowledge and belief, true, accurate, and information, including the possibility of fine and
MINWWYUN	ANDREW A. ORR	- PRESIDENT 3/8/93
XI. Comments		
WE HAVE NOT STORED W	ASTES ON OUR PROPERT	TY SINCE AUGUST 1983.
PADER WAS NOTIFIED 9/	6/83. USEPA WAS N	10TIFIED 7/25/83.





PRODUCTS CORPORATION

HOME OFFICE

P.O. BOX 737 NORRISTOWN, PENNSYLVANIA 19404 TELEPHONE 215-277-1010 CABLE: SPRAYCO

December 6, 1983

Mr Gayle Leader
Sanitary Engineer
Division of Hazardous Waste Management
Department of Environmental Resources
Commonwealth of Pennsylvania
P.O. Box 2063
Harrisburg, PA 17120

RE: PAD042716084

Dear Mr. Leader:

At the request of Anthony Taylor, Solid Waste Specialist, DER, Norristown, PA, we are resubmitting the notification form showing a change in the designation of our waste from D001, ignitable waste, to U002, acetone, since acetone is the largest single component of our waste "wash" solvent.

To complicate matters, we are changing our wash solvent to a reclaimed product called Cyclesolv 60, an Inland Chemical product, which is a 60% minimum blend of ketones and esters, 40% maximum blend of alcohols and aromatic hydrocarbons, and 5% maximum chlorinated hydrocarbons. We are attempting to get a more definitive breakdown of the product, but in the meantime, we believe this should be designated as ignitable wastes, D001, and perhaps should be retained in our activity report. We would appreciate your advice on this.

We have also enclosed, at Mr. Taylor's request, quarterly reports for all those quarters in which waste was not removed from the site for recycling. We misunderstood the regulations and only filed when waste was shipped off the site.

Sincerely,

SPRAY/PRODUCTS CORPORATION

Andrew A. Orr President

AAO/lmw

Enclosures

ER-SWM-53: Rev. 3/82

BUREAU OF SOLID WASTE MANAGEMENT NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

I INSTALLATION'S EPA I.D. NUMBER	
PADC42716C84	
SPRAY PRODUCTS CORPORATION	
STREET OR P. O. BOX	
P.C. Bex 737	
CITY OR TOWN	ST. ZIP CODE
NORRISTOWN	IPAI 19404
IV. LOCATION OF INSTALLATION	
STREET OR ROUTE NUMBER	MUNICIPALITY
E/S CONSHOHOCKEN' ROAD	PLYMIOUTH TOWNSHIP
CITY OR TOWN	ST. ZIP CODE COUNTY
NORRISTOWN	PA 19401 MONTGOMERY
MAME AND TITLE (lest, first, & job title)	PHONE NO. faree code & no.)
ORR, ANDREW A, PRESID	PENT 2/15/2/7/1/01/2
VICOWNERSHIP	
A. NAME OF INSTALLA	ATION'S LEGAL OWNER
SPRAY PRODUCTS CORPORAT	TION
B. TYPE OF OWNERSHIP	
(enter the appropriate letter into box)	
F = FEDERAL M = NON-FEDERAL	DEC 9 1983
VII SIC CODES (4-digit in order of priority)	
A. FIRST	C.THIRD ,
2899 (specify) CHEMICAL SPECIALTIES	(specify)
B. SECOND	D. FOURTH
2951 (specify) AEROSOL PAINTS	(specify)
L TYPE OF HAZARDOUS WASTE ACTIVITY	·
A GENERATION C. STORE E. TR.	ANSPORTATION G. REUSE, RECYCLE, RECLAIM
	OMPLETE ITEM IX
	RMIT BY RULES H. OTHER (specify):
IX MODE OF TRANSPORTATION (transporters only)	
A. AIR B. RAIL C. HIGHWAY D. WA	TER E. OTHER (specify):
X EXISTING ENVIRONMENTAL PROGRAM PERMITS	
A. NPDES (Discharges to Surface Water) D. PSD (Air Emissions from Pi	roposed Sources
B. UIC (Underground Injection of Fluids) E. SQLID WA	STE
C: RCRA (Hazardous Wastes) F. OTHER	(specify).
XI. TYPE OF NOTIFICATION,	
Mark "X" in appropriate box to indicate whether this is your installation's	s first notification of hazardous waste activity, or notification of a change of
general information, hazardous waste handled, or hazardous waste activity. If y TIONS).	/ou check B, C, D, E, or F, attach a letter of explanation (SEE INSTRUC-
A. FIRST NOTIFICATION C. DELETION OF	

XII DESCRIPTION OF HA	ZARDOUS WASTES	Continued from front			•	
A. HAZARDOUS WASTE		FIC SOURCES. Enter the		m \$75.261(h)(2)	for each listed hezerdous	weste .
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B. HAZARDOUS WASTE	EDOM CRECIEIO COI	IDCES Enter the four-of	init dumber from \$75.	S1(h)(3) each lister	hazarrinsse waste from st	ecific
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25	26	27	28	29	30	
C. COMMERCIAL CHEMI		RDOUS WASTES, Enter : lous waste. Use additional		rom 575.261(h)(4)	for each chemical substa	nee
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UC02						
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37	38	39	40	41	42	
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730 - 11	44	46	46	47	48	
				2		
D. CHARACTERISTICS O	F NON-LISTED HAZA	RDOUS WASTES, Mark	"X" in the boxes corres	ponding to the char	acteristics of non-listed	
		575.261(g)(2) through			•	
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XIII CERTIFICATION		•				
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I certify under penalt attached documents, a I believe that the sub submitting false inform	nd that based on m	inquiry of those in	dividuals immediatel	y responsible fo	or obtaining the info	rmation,
I believe that the sub-	mitted information	is true, accurate, and	l complete. I am and imprisonment	aware that there	are significant penal	Ities for
and meeting raise mitori	nation, morading the	possibility of fine	ing imprisorment			
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PRODUCTS CORPORATION

HOME OFFICE

P.O. BOX 737 NORRISTOWN, PENNSYLVANIA 19404 TELEPHONE 215-277-1010 CABLE: SPRAYCO

December 6, 1983

Mr. Gayle Leader Sanitary Engineer Division of Hazardous Waste Management Department of Environmental Resources Commonwealth of Pennsylvania P.O. Box 2063 Harrisburg, PA 17120

RE: PAD042716084

Dear Mr. Leader:

At the request of Anthony Taylor, Solid Waste Specialist, DER, Norristown, PA, we are resubmitting the notification form showing a change in the designation of our waste from DOO1, ignitable waste, to UOO2, acetone, since acetone is the largest single component of our waste "wash" solvent.

To complicate matters, we are changing our wash solvent to a reclaimed product called Cyclesolv 60, an Inland Chemical product, which is a 60% minimum blend of ketones and esters, 40% maximum blend of alcohols and aromatic hydrocarbons, and 5% maximum chlorinated hydrocarbons. We are attempting to get a more definitive breakdown of the product, but in the meantime, we believe this should be designated as ignitable wastes, DOO1, and perhaps should be retained in our activity report. We would appreciate your advice on this.

We have also enclosed, at Mr. Taylor's request, quarterly reports for all those quarters in which waste was not removed from the site for recycling. We misunderstood the regulations and only filed when waste was shipped off the site.

Sincerely,

SPRAY/PRODUCTS CORPORATION

Andrew A. Orr President

AAO/lmw

Enclosures

ER-SWM-53: Rev. 3/82

BUREAU OF SOLID WASTE MANAGEMENT NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

I INSTALLATION'S EPA I.D. NUMBER		
PADO42716084		A Company of the Comp
		,
SPRAY PRUDUCTS CORPORATION III INSTALLATION MAILING ADDRESS		
STREET OR P. O. BOX		
P.O. BOX 737		
CITY OR TOWN		ST. ZIP CODE
NORRISTOWN		PA 19404
IV. LOCATION OF INSTALLATION		
STREET OR ROUTE NUMBER	The street of the second secon	MUNICIPALITY
E/S CONSHOHOCKEN ROAD	·····	PLYMOUTH TOWNSHIP
CITY OR TOWN	ST. ZIP CODE	COUNTY
NORRISTOWN	IPA 19401	MONTGOMERY
V INSTALLATION CONTACT		
		PHONE NO. faree code & no.)
	DENT	2/15/12/7/11/10/12
NAME AND TITLE (last, first, & job title) ORR, ANDREW A. PRESIDENT VI OWNERSHIP A. NAME OF INSTALLATION'S LEGAL OWNER SPRAY PRODUCTS CORPORATION (E.G.) B. TYPE OF OWNERSHIP (onter the appropriate letter into box) F = FEDERAL M = NON-FEDERAL PHONE NO. ferree code & no.) ORR OF TITLE (last, first, & job title) PHONE NO. ferree code & no.) ORR OF TOTAL CORPORATION DEC 9 1983		
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VII SIC CODES (4-digit in order of priority)		
A. FIRST	**************************************	C. THIRD
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B. SECOND		D. FOURTH
28511 (SPECIFY) AEROSOL PAINTS	(specify)	
TYPE OF HAZARDOUS WASTE ACTIVITY		
-1.1ZM: 1.1 anii - 22 anii - 1 - 1 - 1 - 2 - 2 - 2 - 1 - 1 - 2 - 2	ransportation [Complete Item 1x]	G. REUSE, RECYCLE, RECLAIM
D. DISPOSE F, F	PERMIT BY RULE	H. OTHER (specify):
IX MODE OF TRANSPORTATION (transporters only)		
A. AIR B. RAIL C. MIGHWAY D. V	NATER E. OTHE	n (specify):
X EXISTING ENVIRONMENTAL PROGRAM PERMITS		
A. NPDES (Discharges to Surface Water) D. PSD (Air Emissions from	Proposed Sources	•
		orania de la compania
B. UIC (Underground Injection of Fluids) E. SOLID V	VASTE	
C: RCRA (Hazardous Wastes) F. OTHE	R	(medity)
XI. TYPE OF NOTIFICATION,		
Mark "X" in appropriate box to indicate whether this is your installation general information, hazardous waste handled, of hazardous waste activity.	n's first notification of haz	rardous waste activity, or notification of a change of
	1000年,北京	F, assect a latter of explanation (SEE INSTRUC-
A. FIRST NOTIFICATION C. DELETION B. CHANGE OF GENERAL INFORMATION D. ADDITION	and the Committee of th	E. DELETION OF AN ACTIVITY F. ADDITION OF AN ACTIVITY

XII DESCRIPTION OF HAZARD	OUS WASTES (Continued for	rom front)			
A. MAZARDOUS WASTES FROM	M NON-SPECIFIC SOURCE installation handles. Use a	ES. Enter the four-diditional sheets if nece	gis number from \$70 mary.	i.261(h)(2) for each li	sted hexardous weste
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	8	9			12
B. HAZARDOUS WASTES FROM	SPECIFIC SOURCES, Ent	er the four-digit num	ber from \$75,261(h)(3) eech listed hazardou	s waste from specific
Industrial sources your installati					
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	20	21	 	23	24
26	26		28	29	30
		ÎI 🗀			
C. COMMERCIAL CHEMICAL PR your installation handles which				75.261(h)(4) for each (chemical substance
31	32	33	34	35	36
<u> </u>	38	39			42
43 -	44	46	46	47	48
D. CHARACTERISTICS OF NON- hazardous wastes your installati			ne boxes correspondin	g to the characteristics	of non-listed
☐ 1. IGNITABLE	2. COR	ROSIVE	3. REACTIV	r E	4. EP TOXIC
XIII CERTIFICATION				<u> </u>	
I certify under penalty of la attached documents, and that I believe that the submitted submitting false information,	nw that I have personal t based on my inquiry information is true, ac including the possibili	ly examined and a of those individual ccurate, and compl lity of fine and in	m famillar with the simmediately resulted in a superior control of the superio	e information subr co nsible for obtain that there are sig	nitted in this and all ning the information, nuicant penalties tor
SIGNATURE /) n	NAME and OFFIC AN DREM PRESID	ALTITLE (Type or A. ORR	Print)	11/2-8/83
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B. walch



PRODUCTS CORPORATION

HOME OFFICE

W. of Hezerdous Weste

P.O. BOX 737 NORRISTOWN, PENNSYLVANIA 19404 TELEPHONE 215-277-1010 CABLE: SPRAYCO

September 6, 1983

Commonwealth of Pennsylvania Department of Environmental Resources P.O. Box 2063 Harrisburg, PA 17120

Attention: Mr. Gayle Leader, Sanitary Engineer

Div. of Hazardous Waste Management

RE: PAD 042716084

Gentlemen:

As requested, we have completed and are returning the Notification Form indicating a change in status at our facility.

As indicated in our earlier letters to U.S.E.P.A. and to your Regional Office in Norristown, we no longer plan to store ignitable waste for more than ninety (90) days. We have made arrangements with McKesson Envirosystems to remove our "dirty" wash solvent (ignitable waste) every sixty (60) days to seventy-five (75) days and replace it with "clean" wash solvent.

Mr. Anthony Taylor of your Norristown Office visited our facility on August 11, 1983, and with his assistance and the assistance of Emcon Associates, Pottstown, PA, we will make sure that proper closure documentation is prepared and that proper procedures are followed in operating as only a generator.

Sincerely,

SPRAY PRODUCTS CORPORATION

Andrew A. Orr

President

wm.L\OAA

ER-SWM-53: Rev. 3/82

BUREAU OF SOLID WASTE MANAGEMENT NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

SK-SWM-55: ICEV. 5/62 NOTIFICATION	of nazardous v	ASIL ACTIVIT	111111	11.17
INSTALLATION'S EPA I.D. NUMBER		45		
PAD042716084	Region of the Arthur	ido para esta esta esta esta esta esta esta est		Bzardous Wines
NAME OF INSTALLATION				i de
SPRAY PRODUCTS CORF	ORATION			
III INSTALLATION MAILING ADDRESS	LATION'S EPA, I.D. NUMBERS APPRIDUCTS CORPORATION			
STREET OR F. O. SOX				
P.O. BOX 737				
			ST.	ZIP CODE
NORRISTOWN			IP/A	19404
IV LOCATION OF INSTALLATION				4 15 2 15 15 15 15 15 15 15 15 15 15 15 15 15
E/S CONSHOHOCKEN F	ROAD	F	LYMOUTH	TOWNSHIP
CITY OF TOWN	ST.	ZIP CODE	COL	INTY
NORRISTOWN	PA	19401		
V INSTALLATION CONTACT				
MAME AND TITLE (last, first, a	iob title)	YKK I	PHO	DNE NO. farse code & no.)
OKK ANDREW A. PR	ESIDENT		211	5 277 101
VI OWNERSHIP				
A. NAME C	F INSTALLATION'S	LEGAL OWNER		
SPRAY PRODUCTS CORPO	RATION			
B. TYPE OF OWNERSHIP				
(enter the appropriate letter into box)				
F = FEDERAL M = NON-FEDERAL				
VII SIC CODES (Adjust in order of priority)			27/00/20	
			C THIRD	
-[. 	(specify)	C, THIND	<u> </u>
		Attaches to the Control of the	ID FOURTH	
		Marie Control of the	3,3,1 0 3,111	
TYPE OF HAZARDOUS WASTE ACTIVITY				
	E. TRANSPOR	TATION	G. REUSE. R	ECYCLE, RECLAIM
	(COMPLETE	ITEM IX)		
	F. PERMIT BY	RULE	H. OTHER IS	pecify)1
		E. OTHER (#	ecify):	
710, Y/1 Y (1) THE RESEARCH OF				1
A. NPUES IDISCHARGE TO SURFACE WATER!	stions from Proposed S	ources/		
<u> </u>			nggar ^a	
B. UIC (Underground Injection of Fluids)	SOLID WASTE			
C: RCRA (Hazardous Wastes)	F. OTHER		(apacify)	Sanda Sanda
XI. TYPE OF NOTIFICATION,				
	installation's files	ification of harm		madification of
general information, hazardous waste handled, of hazardous waste TIONS).	activity. If you check	CB, C, D, E, or F,	ius waste activity, or attach a letter of exp	notification of a change of planation (SEE INSTRUC-
TIONS).				
		. •		N OF AN ACTIVITY
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XII DESCRIPTION OF HAZARDOUS WASTES-(Continued from front)
A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from \$75.261(h)(2) for each listed hezardous waste from non-specific sources your installation handles. Use additional sheets if necessary.
B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from \$75.261(h)(3) each listed hazardous waste from specific
industrial sources your installation handles. Use additional sheets if necessary. 13 14 15 16 17 18
C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four—digit number from \$75.261(h)(4) for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.
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D. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hezardous wastes your installation handles. (See \$75.281(g)(2) through (5))
1. IGNITABLE 2. CORROSIVE 3. REACTIVE 4. EP TOXIC
XIII CERTIFICATION
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.
SIGNATURE NAME and OFFICIAL TITLE (Type or Print) DATE SIGNED ANDKEW A, ORR, PRESIDENT 9/6/83
FOR OFFICIAL USE ONLY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS
PHILADELPHIA. PENNSYLVANIA 19106

AUG 15 1983

Mr. Richard Shipman
PA Department of Environmental Resources
Division of Hazardous Waste Management
Compliance Section
P.O. Box 2063
Harrisburg, PA 17120

Dear Rick:

Attached is another list of TSD facilities which are withdrawing their Part As. Please review your files and check with your regional offices in order to verify the facility's claims.

Thanks again for your cooperation in this matter.

Sincerely yours,

William L. Walsh, EPA

Waste Enforcement Section

Attachment

cc: Jim Webb (3AW22)

Greg Koltonuk (3AW22) Joanne McKernan (3AW32) William Walsh (3AW22)

REGION I-NORRISTOWN

Greene, Tweed & Co., Inc.-Kulpsville-PAD 98 055 5197-7/15/83 letter to DER's central office states that the company switched to less than 90 day storage in October of 1982 and is now a generator only.

Greene, Tweed & Co., Inc.-North Wales-PAD 07 550 4795- Same as above.

Spray Products Corp. Norristown-PAD 04 271 6084-7/25/83 letter to EPA states that the facility will close its storage area in August and will switch to less than 90 day storage.

REGION V-PITTSBURGH

Drakenfeld Colors-Washington-PAD 04 173 1670-3/8/83 letter to Chuck Duritsa states that the site's treatment qualifies for a permit-by rule and a 6/3/83 letter to Gary Galida states that the storage is not greater than 90 days.

Koppers Co., Inc.-Morgan-PAD 00 080 0862-5/3/83 letter to Chuck Duritsa states that the facility is only a generator with storage under 90 days.

Koppers Co., Inc.-Petrolia-PAD 00 433 67310 Same as above, except letter was sent to Russ Crawford.

Teledyne Vasco-Colonial Plant-Monaca-PAD 00 065 1273-7/13/83 letter to Chuck Duritsa states that the facility's storage is under 90 days and their treatment qualifies for permit-by-rule. However, Part A shows treatment is impoundments. What is the situation here?

REGION VI-MEADVILLE

BFG Electroplating & Mfg. Co.-Punxsutawney-PAD 00 434 4008-7/18/83 letter to Gayle Leader states that the facility's storage and treatment tanks qualify for a permit-by-rule.

Elgin Electronics*-Waterford-PAD 00 042 8136-7/12/83 letter to DER's central office states that the storage is now for less than 90 days.



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

PRD042716084

SPRAY PRODUCTS CORPORATION

PO BOX 737

RECEIVED

OCT 1 & 1980

INSTALLATION ADDRESS

E/S CONSHOHOCKER FD FORRISTONE

SPRAY PRODUCTS CORP.

EPA Form 8700-12A (4-80)



EPA Form 8700-12B (4-80)

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER	>	•PAD042716084		
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INSTALLATION ADDRESS		E/S CONSHOHOCKEN RD NORRISTOWN	PA	19401
Form 8700-12B (4-80)	_	10/09/80		

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EPA Form 8700-12 (6-80) REVERSE

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EPA Form 8700-12 (6-80)

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all									
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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.									
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EPA Form 8700-12 (6-80) REVERSE

Hazardous Waste Quantity Notification

Business Name DPRAY PRODUCTS CORP
Business Address P.O. Box 737
NOPRISTONN PA. 19404
EPA ID Number PAD042716084
Hazardous Waste Generated
0 - 100 kg/month //
100 - 1000 kg/month //
1000 kg/month or more

MMW AUN - PRESIDENT - 11/14/85
Signature and Title
(ANDREW A. ORR)

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NOV 1 = 1985

SPRAT PRUDUCISCURP.



Official Business Penalty for Private Use \$300 FIRST-CLASS MAIL POSTAGE & FEES PAID EPA PERMIT NO. G-35

United States Environmental Protection Agency Washington DC 20460

JOHN A ARMSTEAD VA/WV SECTION (3HW31) US EPA REGIONIII 841 CHESTNUT ST. PHILADELPHIA, PA 19107

EPA Form 5180-11 (5-79)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

841 Chestnut Building Philadelphia, Pennsylvania 19107

SEP 12 1985

Dear Sir/Madam:

Beginning on August 5, 1985, Federal law requires that any firm that produces more than 100 kilograms (220 pounds or approximately one-half of a 55-gallon drum) of hazardous waste in a calendar month use the Uniform Hazardous Waste Manifest when shipping its hazardous waste off site. Under the new law, establishments that generate 100 kilograms but less than 1000 kilograms in a calendar month will be designated as small quantity generators, (SQG).

This letter is being sent to you because you notified EPA of your activity as a handler of hazardous waste, and therefore are subject to regulation under the Resource Conservation and Recovery Act (RCRA). As a generator of hazardous waste, please complete the attached form by entering your business name and address, the amount of hazardous waste generated at your facility and return the form to this office as soon as possible.

Your cooperation with this effort to identify the small quantity generator is appreciated and will be useful in maintaining an accurate data base of hazardous waste handlers. If you have any questions regarding the small quantity generator requirements, please contact Mr. John A. Armstead at (215) 597-7354 or at the above address.

Sincerely

Robert L. Allen, Chief

RECEIVED

Waste Management Branch

NOV 1 4 1985

SPRAY PRODUCTS CORP.

Hazardous Waste Quantity Notification

Business Name SPRAY PRODUCTS CORP	
Business Address P.O. Box 737	
NOPRISTONN PA. 19404	
EPA ID Number <u>PADO 42716084</u>	
Hazardous Waste Generated	
0 - 100 kg/month //	
100 - 1000 kg/month //	
1000 kg/month or more	
Andrew Allen - Porcent	,,

Signature and Title (ANDREW A. ORR)

RECEIVED

NOV 1 4 1985

SPHAY PRUDUCISCORP.



HOME OFFICE

P.O. BOX 737 NORRISTOWN, PENNSYLVANIA 19404 TELEPHONE 215-277-1010 CABLE: SPRAYCO

December 6, 1983

Mr. Gayle Leader
Sanitary Engineer
Division of Hazardous Waste Management
Department of Environmental Resources
Commonwealth of Pennsylvania
P.O. Box 2063
Harrisburg, PA 17120

RE: PAD042716084

Dear Mr. Leader:

At the request of Anthony Taylor, Solid Waste Specialist, DER, Norristown, PA, we are resubmitting the notification form showing a change in the designation of our waste from DOO1, ignitable waste, to UOO2, acetone, since acetone is the largest single component of our waste "wash" solvent.

To complicate matters, we are changing our wash solvent to a reclaimed product called Cyclesolv 60, an Inland Chemical product, which is a 60% minimum blend of ketones and esters, 40% maximum blend of alcohols and aromatic hydrocarbons, and 5% maximum chlorinated hydrocarbons. We are attempting to get a more definitive breakdown of the product, but in the meantime, we believe this should be designated as ignitable wastes, D001, and perhaps should be retained in our activity report. We would appreciate your advice on this.

We have also enclosed, at Mr. Taylor's request, quarterly reports for all those quarters in which waste was not removed from the site for recycling. We misunderstood the regulations and only filed when waste was shipped off the site.

Sincerely,

SPRAY/PRODUCTS CORPORATION

Andrew A. Orr President

AAO/lmw

Enclosures



HOME OFFICE

P.O. BOX 737 NORRISTOWN, PENNSYLVANIA 19404 TELEPHONE 215-277-1010 CABLE: SPRAYCO

November 28, 1983

Mr. Anthony Taylor Solid Waste Specialist Commonwealth of Pennsylvania Department of Environmental Resources 1875 New Hope Street Norristown, PA 19401

RE: Hazardous Waste Inspection August 11, 1983 EPA ID No. PADO42716084

Dear Mr. Taylor:

Confirming our telephone conversation on November 23, 1983 concerning your letter of November 14, 1983 and the specific items therein:

- 1. We will comply with your request and change the waste designation from DOOl to UOOl. However, it should be noted we are using another "wash" solvent, Cyclesolv 60, an Inland Chemical product, which is a 60% minimum blend of ketones and esters, 40% maximum blend of alcohols and aromatic hydrocarbons, and 5% maximum chlorinated hydrocarbons. This is a reclaimed product, and we are attempting to obtain a more definitive breakdown of the product.
- 2. We have been attempting since last August to obtain a letter from McKesson Envirosystems of New Castle, Kentucky. To date, we have been unsuccessful.
- 3. This condition was corrected immediately and we are now affixing the necessary labels to the containers.
- 4. This condition was corrected.
- 5. This condition was corrected.
- 6. These will be submitted immediately.

Mr. Anthony Taylor November 28, 1983 Page 2

- 7. The primary discharge on the pad was an asphelt product used as a tree wound compound. Instructions have been issued to store empty drums in such a manner as to prevent spillage. Any solvent on the pad would have evaporated.
- 8. Initial drafting of a PPC Plan was begun in September. It is expected to be completed by the end of December.
- 9. As shown in your inspection report, we generate approximately 1753 kg./mo. or less of hazardous waste.

We have contracted for the building of a dike for containing our hazardous waste and have prepared procedures for regular inspections of the area. Finally, a draft of the closure plan was prepared in September and will be submitted with our FPC Plan.

Sincerely,

SFPAY PRODUCTS CORPORATION

Andrew A. Orr President

AAO/lmw

Department of Environmental Resources

1875 New Rope Street Norristown, PA 19401 215 631-2420

October 19, 1983

Mr. Andrew Orr, President Spray Products Corporation Box 737 Norristown, PA 19404 REGENTING

OCT 2 4 1983

Re: IdentificationEmpro BAD 042716084

Dear Mr. Orr:

It has been determined by our staff that you are not a TSD facility or that you qualify under the permit by rule provision in our bazardous waste management rules and regulations.

Therefore, you will not have to submit a Part B hazardous waste permit application and we are returning your Part A application if you previously submitted one to the Department.

This means you no longer have interim status as a TSD facility and you may not engage in this type of activity at your facility. You will not be required to secure a hazardous waste management permit for your facility, but you are still subject to any portion of the hazardous waste management rules and regulations published in the Pennsylvania Bulletin September 4, 1982 which pertain to your facility. This includes the submission of a closure plan if you operated as a treatment storage or disposal facility after November 19, 1980.

If you qualify under the permit by rule provision of the regulations then you may continue to operate as a hazardous waste facility in accordance with NFDES or local sever authority requirements.

This does not release you from Environmental Protection Agency requirements. You will have to contact their Philadelphia Regional Office to verify that you do not have to submit a Part B application to their agency.

If you have any questions concerning this, I can be reached at 631-2420.

Very truly yours,

RECEIVED
Facilities Management Section

NOV 1 5 1983

U.S. EPA, Region III

LAMRENCE H. LUNSK Solid Waste Pacilities Supervisor

cc: Plymouth Township
Montgomery County Health Commission
US FPA (Attn: 3AV32)

Division of Hazardous Waste Hanagement
Re 30 Z879.2



HOME OFFICE

P.O. BOX 737 NORRISTOWN, PENNSYLVANIA 19404 TELEPHONE 215-277-1010 CABLE: SPRAYCO

September 6, 1983

Commonwealth of Pennsylvania Department of Environmental Resources P.O. Box 2063 Harrisburg, PA 17120

Attention: Mr. Gayle Leader, Sanitary Engineer

Div. of Hazardous Waste Management

RE: PAD 042716084

Gentlemen:

As requested, we have completed and are returning the Notification Form indicating a change in status at our facility.

As indicated in our earlier letters to U.S.E.P.A. and to your Regional Office in Norristown, we no longer plan to store ignitable waste for more than ninety (90) days. We have made arrangements with McKesson Envirosystems to remove our "dirty" wash solvent (ignitable waste) every sixty (60) days to seventy-five (75) days and replace it with "clean" wash solvent.

Mr. Anthony Taylor of your Norristown Office visited our facility on August 11, 1983, and with his assistance and the assistance of Emcon Associates, Pottstown, PA, we will make sure that proper closure documentation is prepared and that proper procedures are followed in operating as only a generator.

Sincerely,

SPRAY PRODUCTS CORPORATION

Andrew A. Orr

President

AAO/lmw

BUREAU OF SOLID WASTE MANAGEMENT NOTIFICATION OF HAZARDOUS WASTE ACTIVITY ER-SWM-53: Rev. 3/82 INSTALLATION'S EPA LD. NUMBER NAME OF INSTALLATION CORPORATION PRODUCT III INSTALLATION MAILING ADDRESS STREET OR P. C. BOX P.O. BOX ZIP CODE CITY OR TOWN NORRISTOWN 9404 IV LOCATION OF INSTALLATION MUNICIPALITY STREET OR ROUTE NUMBER CONSHOHOCKEN $\mathcal{R}oA\mathcal{D}$ PLYMOUTH TOWNSHIP CITY OR TOWN ZIP CODE COUNTY 19401 NORRISTOWN V INSTALLATION CONTACT MAME AND POTES flast, first, & job title! PHONE NO. faree code & no.) PRESIDENT VI. OWNERSHIP A. HAME OF INSTALLATION'S LEGAL OWNER CORPORATION PRODUCTS B. TYPE OF OWNERSHIP (enter the appropriate letter into box) F - FEDERAL M - NON-FEDERAL VII SIC CODES (4-dight in order of priority) A. FIRST CHEMICAL SPECIALTIES B. SECOND D. FOURTH 851 PARCITY AEROSOL IL TYPE OF HAZARDOUS WASTE ACTIVITY A. GENERATION C. STORE C. SAMPPORTATION C. STORE S. REUSE, RECYCLE, RECLAIM. IX MODE OF TRANSPORTATION (transporters only) A APPEN SERALL CHIGHENING OF WATER SET OF THE RESERVE X EXISTING ENVIRONMENTAL PROGRAM PERMITS TO HE ROLL BY OTHER XI. TYPE OF NOTIFICATION. Mark "X" in appropriate box to indicate whether this is year installation's first negligible of fazzardous waste activity, or notification of a change of general information, hazardous waste handled, of hazardous waste activity. If you check B, C, D, E, or F, attach a letter of explanation (SEE INSTRUCTIONS).

A. FIRST NOTIFICATION

C. DELETION OF A WASTE

B. CHANGE OF GENERAL INFORMATION

D. ADDITION OF A WASTE

F. ADDITION OF AN ACTIVITY

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COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES Post Office Box 2063 Harrisburg, Pennsylvania 17120 August 23, 1983



(717) 787-7381

Andrew Orr, President Spray Products Corporation P.O. Box 737 Norristown, PA 19404

Re: PAD 042716084

Dear Mr. Orr:

I have recently received a copy of your letter to Ms. Shirley Bulkin at EPA dated July 25 in which you request termination of your facility's hazardous waste storage status. Since Pennsylvania has the authority to conduct their own hazardous waste program, it is necessary that all changes in status be reported to this office. You may use the enclosed Notification Form for this purpose. The completed form and an explanatory letter should be sent to the address above.

If you have not already done so you must submit all closure documentation to our Regional Office in Norristown. This information should be sent to:

Wayne Lynn, Regional Solid Waste Manager Department of Environmental Resources 1875 New Hope Street Norristown, PA 19401

If you have any questions, please call either the regional office at (215) 631-2420 or myself at the above number.

Sincerely,

GAYLE LEADER Sanitary Engineer

Division of Hazardous Waste Management

ufe leader

Enclosure

RECEIVED AUG 2 9 1983

SPRAY PRODUCTS CORP.



HOME OFFICE

P.O. BOX 737 NORRISTOWN, PENNSYLVANIA 19404 TELEPHONE 215-277-1010 CABLE: SPRAYCO

July 25, 1983

Mr. Lawrence H. Lunsk Solid Wastes Facilities Supervisor Commonwealth of Pennsylvania Department of Environmental Resources 1875 New Hope Street Norristown, PA 19401

RE: EPA I.D. No. PAD 04 271 6084

Dear Mr. Lunsk:

Having reviewed the requirements for Part B of the application for a Hazardous Waste Management Facility Permit and the continuing requirements for the operation of the site, we have determined that we will remove the storage facility from the system. In the future we will contract to have our waste removed within 90 days of being placed in storage.

We will close the facility during August, 1983 and will retain Emcon Associates, Pottstown, PA to certify that the facility has been closed in accordance with the specifications of an approved closure plan.

Sincerely.

SPRAY PRODUCTS CORPORATION

Andrew A. Orr

President

AAO/lmw

cc: George W. Buchanan, Emcon Associates



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

1875 New Hope Street Norristown, PA 19401 215 631-2420



October 19, 1983

Mr. Andrew Orr, President Spray Products Corporation Box 737 Norristown, PA 19404

Re: Identification No. PAD 042716084

Dear Mr. Orr:

It has been determined by our staff that you are not a TSD facility or that you qualify under the permit by rule provision in our hazardous waste management rules and regulations.

Therefore, you will not have to submit a Part B hazardous waste permit application and we are returning your Part A application if you previously submitted one to the Department.

This means you no longer have interim status as a TSD facility and you may not engage in this type of activity at your facility. You will not be required to secure a hazardous waste management permit for your facility, but you are still subject to any portion of the hazardous waste management rules and regulations published in the Pennsylvania Bulletin September 4, 1982 which pertain to your facility. This includes the submission of a closure plan if you operated as a treatment storage or disposal facility after November 19, 1980.

If you qualify under the permit by rule provision of the regulations then you may continue to operate as a hazardous waste facility in accordance with NPDES or local sewer authority requirements.

This does not release you from Environmental Protection Agency requirements. You will have to contact their Philadelphia Regional Office to verify that you do not have to submit a Part B application to their agency.

If you have any questions concerning this, I can be reached at 631-2420.

Very truly yours,

LAWRENCE H. LUNSK

Solid Waste Facilities Supervisor

cc: Plymouth Township

Montgomery County Health Commission

US EPA (Attn: 3AW32)

Division of Hazardous Waste Management

Re 30 Z879.2

UCT 21 1983

CPRAC PRODUCTS CORP.



HOME OFFICE

P.O. BOX 737 NORRISTOWN, PENNSYLVANIA 19404 TELEPHONE 215-277-1010 CABLE: SPRAYCO

July 25, 1983

Ms. Shirley D. Bulkin RCRA Administrative Support Section Permits Enforcement Branch Region III, U.S. Environmental Protection Agency 6th & Walnut Streets Philadelphia, PA 19106

RE: EPA I.D. No. PAD 04 271 6084

Dear Ms. Bulkin:

Having reviewed the requirements for Part B of the application for a Hazardous Waste Management Facility Permit and the continuing requirements for the operation of the site, we have determined that we will remove the storage facility from the system. In the future we will contract to have our waste removed within 90 days of being placed in storage.

We will close the facility during August, 1983 and will retain Emcon Associates, Pottstown, PA to certify that the facility has been closed in accordance with the specifications of an approved closure plan.

Sincerely,

SPRAY/PRODUCTS CORPORATION

Andrew A. Orr

President

AAO/lmw

cc: George W. Buchanan, Emcon Associates



REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

August 5, 1981

RECEIVED

AUG 1 0 1981

Mr. Andrew A. Orr Spray Products Corporation P.O. Box 737 Norristown, PA 19404

SPRAY PRODUCTS CORP.

Dear Mr. Orr:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

Shirley D. Bulkin

Chief, Administrative Support Section

Permit Enforcement Branch

Enclosure

DITIONS OF OPERATION DURING INTERIM STATUS

Date Prepared: August 5, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

1. Facility name, location, and EPA Identification Number.

Name: Spray Products Corporation

Location: E/S Conshohocken Rd.
Norristown, PA 19401

EPA I.D. No.: PAD 04 271 6084

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Mr. Andrew A. Orr-President

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

PROCESS	DESIGN CAPACITY
S01	10,000 Gals.

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

D001						
			•		•	



REGION III

6TH AND WALNUT STREETS PHILADELPHIA, PENNSYLVANIA 19106

August 5, 1981

Mr. Andrew A. Orr Spray Products Corporation P.O. Box 737 Norristown, PA 19404

Dear Mr. Orr:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

Shirley D Buckers
Shirley D Bulkin

Chief, Administrative Support Section

Permit Enforcement Branch

Enclosure

`ONDITIONS OF OPERATION DURING - INTERIM STATUS

Date Prepared: August 5, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

1. Facility name, location, and EPA Identification Number.

Name:

Spray Products Corporation

Location:

E/S Conshohocken Rd. Norristown, PA 19401

EPA I.D. No.:

PAD 04 271 6084

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name:

Mr. Andrew A. Orr-President

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

PROCESS		DESIGN CAPACITY
S01		10,000 Gals.
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IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

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	DEPHONE CALL DISCUSSION L LOTRIP CONFERENCE
RECORD OF COMMUNICATION	OTHER (SPECIFY)
	(Record of item checked above)
TO: ANDREW A. OAR	FROM: BILL WALSH DATE 7/24/81
SPRAY PRODUCTS CORP.	RASS TIME 10:30 AM
SUBJECT Anual Gty SUMMARY OF COMMUNICATION). of Waste
Toulled Ma Dr.	to ask him to convert his wastes
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CONCLUSIONS, ACTION TAKEN OR REQUIRED	
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EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 8300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

RECORD OF COMMUNICATION	DOTHER (SPECIFY)	ION FIELD	TRIP CONFERENCE
PAD 04 271 6084		of item checked abo	
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EPA Form 1300-6 (7-72) REPLACES EPA HO FORM \$300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

TQ:



HOME OFFICE

P.O. BOX 737 NORRISTOWN, PENNSYLVANIA 19404 TELEPHONE 215-277-1010 CABLE: SPRAYCO

July 21, 1981

Mr. Paul Gotthold RCRA Administrative Support Section Permits Enforcement Branch U.S. Environmental Protection Agency Region III 6th & Walnut Streets Philadelphia, PA 19106

RE: Hazardous Wastes -

EPA I.D. No. PAD 042716084

Dear Mr. Gotthold:

Confirming our telephone conversation, although our waste is a paint waste (K078) which has been temporarily suspended from the wastes list, we do feel that because of its ignitability characteristic it should remain subject to regulation under RCRA with the assigned EPA Hazardous Waste Number of D001.

We will change our files and would appreciate your making the necessary changes in your files.

Sincerely,

SPRAY/PRODUCTS CORPORATION

Andrew A. Orr President

President

AAO/mm



HOME OFFICE

P.O. BOX 737 NORRISTOWN, PENNSYLVANIA 19404 TELEPHONE 215-277-1010 CABLE: SPRAYCO

July 14, 1981

Ms. Shirley D. Bulkin
RCRA Administrative Support Section
Permits Enforcement Branch
U.S. Environmental Protection Agency
Region 111
6th & Walnut Streets
Philadelphia, PA 19106

RE: Paint Wastes - EPA I.D. No. PAD 042716084

Dear Ms. Bulkin:

There is no doubt in our minds that our waste does remain subject to regulation under RCRA. Our waste is "dirty" wash solvent which is retained or stored on our premises prior to being sent to a solvent reclaimer.

Sincerely,

SPRAY PRODUCTS CORPORATION

Andrew A. Orr President

AAO/mm



REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

RECEIVED

July 9, 1981

JUL 13 1981

Mr. Andrew Orr, President Spray Products Corporation P. O. Box 737 Norristown, Penna. 19404

SPRAY PRODUCTS CORP.

RE: Paint Wastes - EPA I.D. No. PAD 04 271 6084

Dear Mr. Orr:

EPA has completed its initial review of your application to treat/store/dispose of hazardous waste under the Resource Conservation and Recovery Act ("RCRA"). The wastes listed as being handled by your facility have been temporarily suspended from regulation as a listed hazardous waste. An amendment to 40 CFR Part 261.32, Hazardous Waste from Specific Sources, was published in the Federal Register on January 16, 1981. This amendment temporarily suspended the listing of all wastes from the manufacture of paints (EPA Hazardous Waste Nos. F017, F018, K078, K079, K081, K082) until further study on those wastes has been conducted. However, wastes which exhibit any of the hazardous waste characteristics (i.e. reactivity, ignitability, corrosivity, and EP toxicity) as defined in 40 CFR Part 261 remain subject to regulation under RCRA.

In order for EPA to return your permit application, EPA requests that you make a determination as to whether or not the waste streams listed on your application are hazardous by one or more of the general characteristics. Ignitability and EP toxicity would be the characteristics which would most likely cause paint manufacturing wastes and residues to be defined as a hazardous waste. Your determination would best be supported by attaching a copy of a laboratory analysis although one is not necessarily required. In order to properly process your permit application and avoid further inquiries, a prompt response would be beneficial to yourself and EPA.

If you have any questions, please do not hesitate to contact Bill Walsh at (215) 597-1230.

All replies should be addressed to:

U.S. Environmental Protection Agency Permits Enforcement Branch 6th and Walnut Streets Philadelphia, PA 19106 Attn: Ms. Shirley D. Bulkin

Sincerely yours,

Shirley D. Bulkin RCRA Administrative Support Section Permits Enforcement Branch



REGION III

MAR 1 7 1981

6TH AND WALNUT STREETS
PHILADELPHIA. PENNSYLVANIA 19106

Certified Mail
Return Receipt Requested

Mr. Andrew Orr Spray Products Corporation P.O. Box 737 Norristown, PA 19404 RECEIVED MAR 24 1991

Added writ of resource the

SPRAY PRODUCTS CORP.

Re: Hazardous Waste Permit Application--Incomplete Application

EPA I.D. Number:

PAD 04 271 6084

Facility Name:

Spray Products Corporation

Facility Location: E/S Conshohocken Road

Norristown, PA 19401

Bear Mr. Orr:

The Environmental Protection Agency (EPA) has reviewed for completeness Part A of a RCRA permit application for the facility referenced above. The Agency has determined that the Part A permit application is incomplete. The items we found missing from the application are marked on the enclosed check list. All missing items marked with an asterisk (*) should be completed on the application form and the form returned to this office by April 17, 1981.

If the applicant fails or refuses to correct the deficiencies in the application within the time set forth above, the Agency may (1) determine that the applicant failed to qualify for interim status; (2) deny the permit; and (3) commence enforcement action under applicable statutory authority, including Section 3008 of the Resource Conservation and Recovery Act.

If you have any questions, please contact Joan Henry on (215) 597-8751 or Bill Walsh on (215) 597-1230.

Sincerely yours,

Shirley D. Bulkin

Chief, RCRA Administrative Support Section

Permit Enforcement Branch

Thirley D. Lucken

Enforcement Division

Enclosure



REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

July 9, 1981

Mr. Andrew Orr, President Spray Products Corporation P. O. Box 737 Norristown, Penna. 19404

RE: Paint Wastes - EPA I.D. No. PAD 04 271 6084

Dear Mr. Orr:

EPA has completed its initial review of your application to treat/store/dispose of hazardous waste under the Resource Conservation and Recovery Act ("RCRA"). The wastes listed as being handled by your facility have been temporarily suspended from regulation as a listed hazardous waste. An amendment to 40 CFR Part 261.32, Hazardous Waste from Specific Sources, was published in the Federal Register on January 16, 1981. This amendment temporarily suspended the listing of all wastes from the manufacture of paints (EPA Hazardous Waste Nos. F017, F018, K078, K079, K081, K082) until further study on those wastes has been conducted. However, wastes which exhibit any of the hazardous waste characteristics (i.e. reactivity, ignitability, corrosivity, and EP toxicity) as defined in 40 CFR Part 261 remain subject to regulation under RCRA.

In order for EPA to return your permit application, EPA requests that you make a determination as to whether or not the waste streams listed on your application are hazardous by one or more of the general characteristics. Ignitability and EP toxicity would be the characteristics which would most likely cause paint manufacturing wastes and residues to be defined as a hazardous waste. Your determination would best be supported by attaching a copy of a laboratory analysis although one is not necessarily required. In order to properly process your permit application and avoid further inquiries, a prompt response would be beneficial to yourself and EPA.

If you have any questions, please do not hesitate to contact Bill Walsh at (215) 597-1230.

All replies should be addressed to:

U.S. Environmental Protection Agency Permits Enforcement Branch 6th and Walnut Streets Philadelphia, PA 19106 Attn: Ms. Shirley D. Bulkin

Sincerely yours,

Shirley D. Bulkin RCRA Administrative Support Section Permits Enforcement Branch



REGION III

MAR 1 7 1981

6TH AND WALNUT STREETS PHILADELPHIA, PENNSYLVANIA 19106

Certified Mail Return Receipt Requested

Mr. Andrew Orr Spray Products Corporation P.O. Box 737 Norristown, PA 19404

SPRAY PRODUCTS CORP.

Hazardous Waste Permit Application--Incomplete Application

EPA I.D. Number:

PAD .04 271 6084

Facility Name:

Spray Products Corporation

Facility Location: E/S Conshohocken Road Norristown, PA 19401

Bear Mr. Orr:

The Environmental Protection Agency (EPA) has reviewed for completeness Part A of a RCRA permit application for the facility referenced above. The Agency has determined that the Part A permit application is incomplete. The items we found missing from the application are marked on the enclosed check list. All missing items marked with an asterisk (*) should be completed on the application form and the form returned to this office by April 17, 1981.

If the applicant fails or refuses to correct the deficiencies in the application within the time set forth above, the Agency may (1) determine that the applicant failed to qualify for interim status; (2) deny the permit; and (3) commence enforcement action under applicable statutory authority, including Section 3008 of the Resource Conservation and Recovery Act.

If you have any questions, please contact Joan Henry on (215) 597-8751 or Bill Walsh on (215) 597-1230.

Sincerely yours, Shirley D. Bulken

Shirley D. Bulkin

Chief, RCRA Administrative Support Section

Permit Enforcement Branch

Enforcement Division

Enclosure

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

6TH AND WALNUT STREETS PHILADELPHIA, PENNSYLVANIA 19106

EPA I.D. # PAD042716084

December 22, 1980

Spray Products Corp. Mr. Andrew Orr P.O. Box 737 Morristown, Pa. 19404

Re: Acknowledgment of Application for a Hazardous Waste Permit

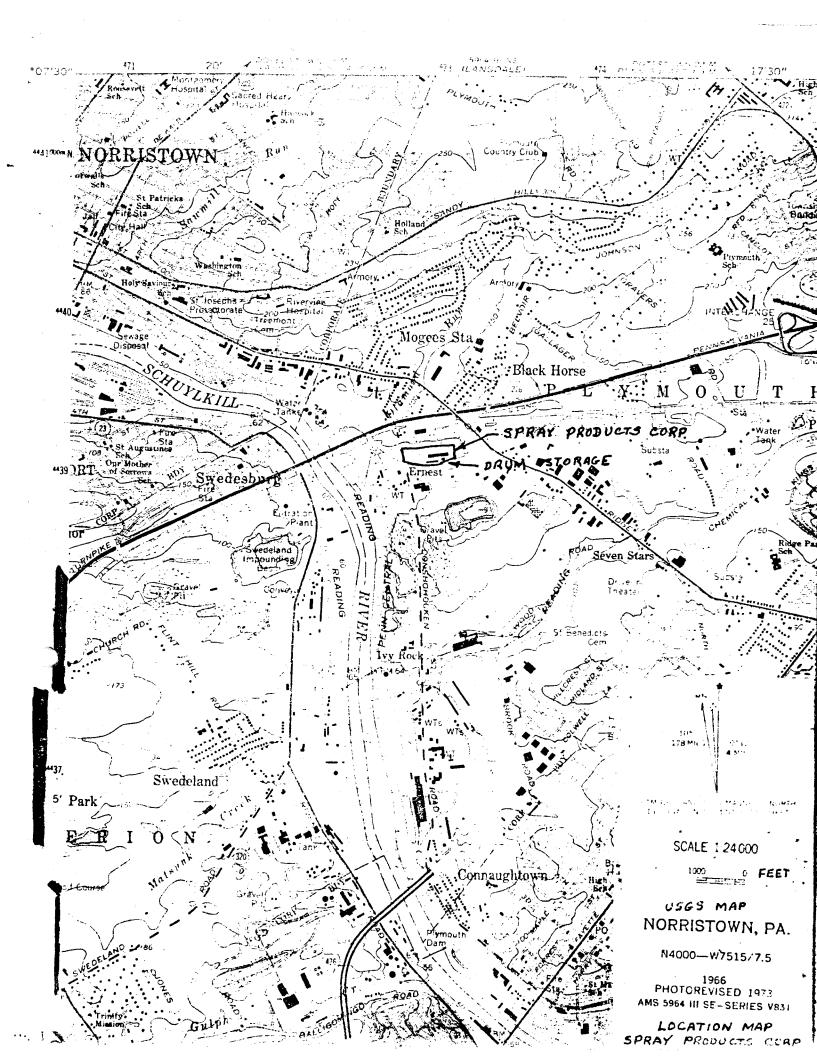
This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility located at the address shown above; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

EQUEST FOR WITHDRAWAL FROM INTERIM STATUS
ACILITY NAME Spray Products Corp.
ACILITY 1.D. NO. PAO 04 271 6084
HECKLIST
Part B Called In?
Submit closure plan for review?
Go through proper closure/post closure
Approved?
Claims corroborated by State/EPA inspection?
Additional future inspections required?
TITHDRAWAL APPROVED Date
Signature

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HIL FACILITY NAME		efected.	ation carefully; if any of it through it and enter the c	correct data in the
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V. MAILING ADDRESS HORRISTONH PA	19404		ieft of the label space lis that should appear), please	provide it in the
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II. POLLUTANT CHARACTERISTICS				
INSTRUCTIONS: Complete A through J to determine a questions, you must submit this form and the supplement if the supplemental form is attached. If you answer "no is excluded from permit requirements; see Section C of the	ital form listed in the "to each question, v	e paranthesis following the que ou need not submit any of the o, Section D of the instruction	estion, Mark "X" in the box in t se forms. You may answar "no	the third column " if your activity
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		include a concentrated	(either existing or proposed) animal feeding operation or on facility which results in a a U.S.? (FORM 2B)	X
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or 8 above? (FORM 2C)		D. Is this a proposed facility	y (other than those described will result in a discharge to	25 24 27
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	25 22 36	F, Do you or will you inject municipal effluent below taining, within one qua	et at this fecility industrial or the lowermost stratum con- arter mile of the well bore, trinking water? (FORM 4)	31 32 33
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4) 1. Is this facility a proposed stationary source which is	34 35 24	cial processes such as m process, solution mining tion of fossil fuel, or rec (FORM 4)	t at this facility fluids for spe- sining of sulfur by the Frasch of minerals, in situ combus- covery of geothermal energy?	" " "
one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5) NAME OF FACILITY		NOT one of the 28 indi instructions and which we per year of any air pollut	ustrial categories listed in the vill potentially emit 250 tons ant regulated under the Clean or be located in an attainment	
SPRAY PRODUCTS	CORPOR	ATION		
15 16 - 25 30 IV. FACILITY CONTACT			Life Control of the C	60 (20)
A. NAME & TITLE (last, fi	rst, & title)	В	. PHONE (area code & no.)	200
ORR ANDREW PRESID	ENT	2.1	5 277 1.010	
V. FACILITY MAILING ADDRESS			12 10 - 31 152 - 35	
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3PO BOX 7.3.7		48		
B. CITY OF TOWN		C.STATE D. ZIP COL	DE TOTAL	
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VI. FACILITY LOCATION				
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B. COUNTY NAME	-	***	A Company of the Comp	
MONTGOMERY		70	The state of the s	
C. CITY OR TOWN		D.STATE E. ZIP COL	F. COUNTY CODE	
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/III. OPERATOR INFORMATION		15 10 - 10		The Comment of the comment
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SPRAY PRODUCTS	CORPORAT	TON		OWNER?
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C. STATUS OF OPERATOR (Enter the appro			D. PHON	IE (area code & no.)
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F. CITY OR TOWN		G.STATE H. ZIP	CODE IX. INDIAN LAN	D CONTRACTOR
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C. RCRA (Hazardous Wastes)	E, OTHE	R (specify)	Venneife	
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XI. MAP		Harris American Commission		
Attach to this application a topographic map				
the outline of the facility, the location of each treatment, storage, or disposal facilities, and				
water bodies in the map area, See instructions			medde an springs, me	
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XIII. CERTIFICATION (see instructions)	Company of the Company	Colors (Charleton		Control of the second
I certify under penalty of law that I have per attachments and that, based on my inquiry application, I believe that the information is false information, including the possibility of	of those persons imm true, accurate and com	ediately responsible for	obtaining the informa	tion contained in the
A. NAME & OFFICIAL TITLE (type or print)	B. SIGNAT	y-9 ^E / 2	111	DATE SIGNED
ANDREW A. ORR -PRES	SIDENT A	nams	Alla	1./12/80
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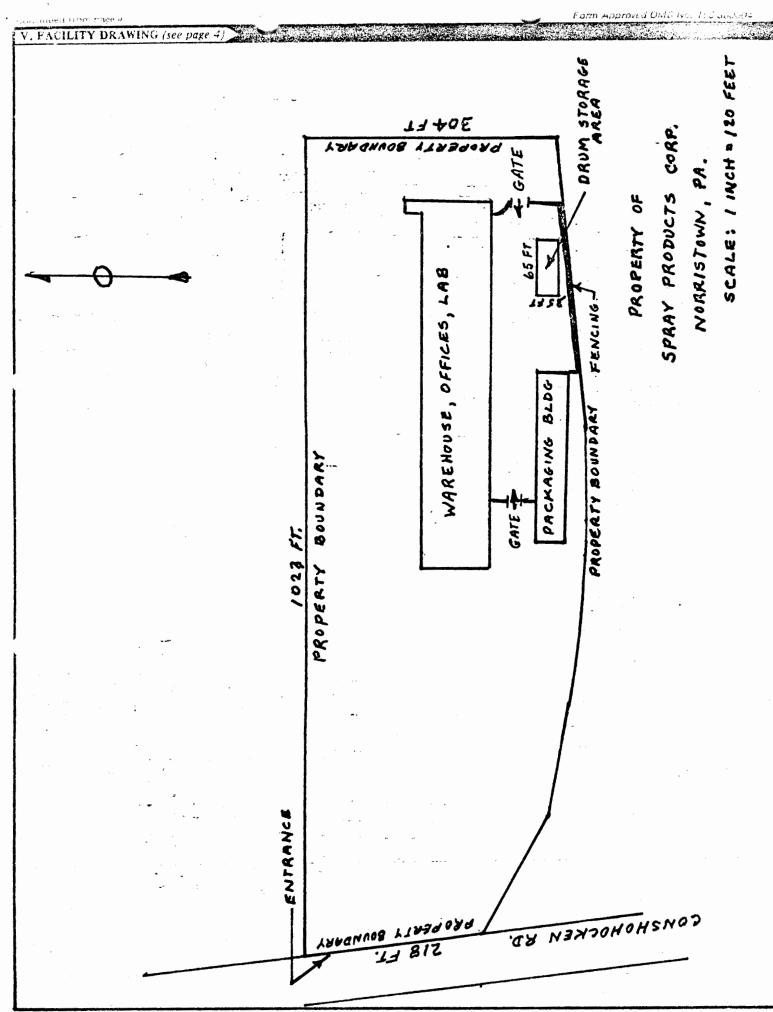
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HI. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES ON FOR DESCRIBING OTHER PROCESSES (code "TU1"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

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All existing facilities must include in the space provided on	page 5 a scale drawing of the facility (see instructions for me	ore detail).
VI. PHOTOGRAPHS	经验证的证据,其实的生态的关系的证明的证明的证明	
All existing facilities must include photographs (aer	rial or ground-level) that clearly delineate all existing	structures; existing storage,
	rage, treatment or disposal areas (see instructions for	more detail).
VII. FACILITY GEOGRAPHIC LOCATION		A Maria de la companya de la company
LATITUDE (degrees, minutes, & second	EONGTTODE (degr	ees, minutes, & seconds)
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VIII. FACILITY OWNER		75 76 77 - 78
	listed in Section VIII on Form 1, "General Information", pla	ace an "Y" in the how to the left and
skip to Section IX below.	nsted in Section VIII on Form 1, General Information , pi	ace and A in the box to the fert and
	Used in Costine Will on Form 1 complete the following in	
If the facility owner is not the facility operator as	listed in Section VIII on Form 1, complete the tollowing ite	
	His Control of the Co	ms:
	LITY'S LEGAL OWNER	ms: 2. PHONE NO. (area code & no.)
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PRODUCTS CORPORATION

HOME OFFICE

P.O. BOX 737 NORRISTOWN, PENNSYLVANIA 19404 TELEPHONE 215-277-1610 CABLE: SPRAYCO



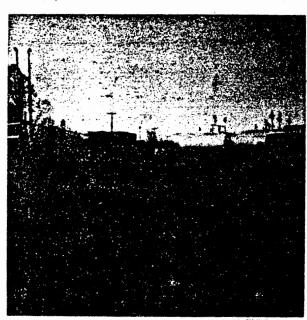
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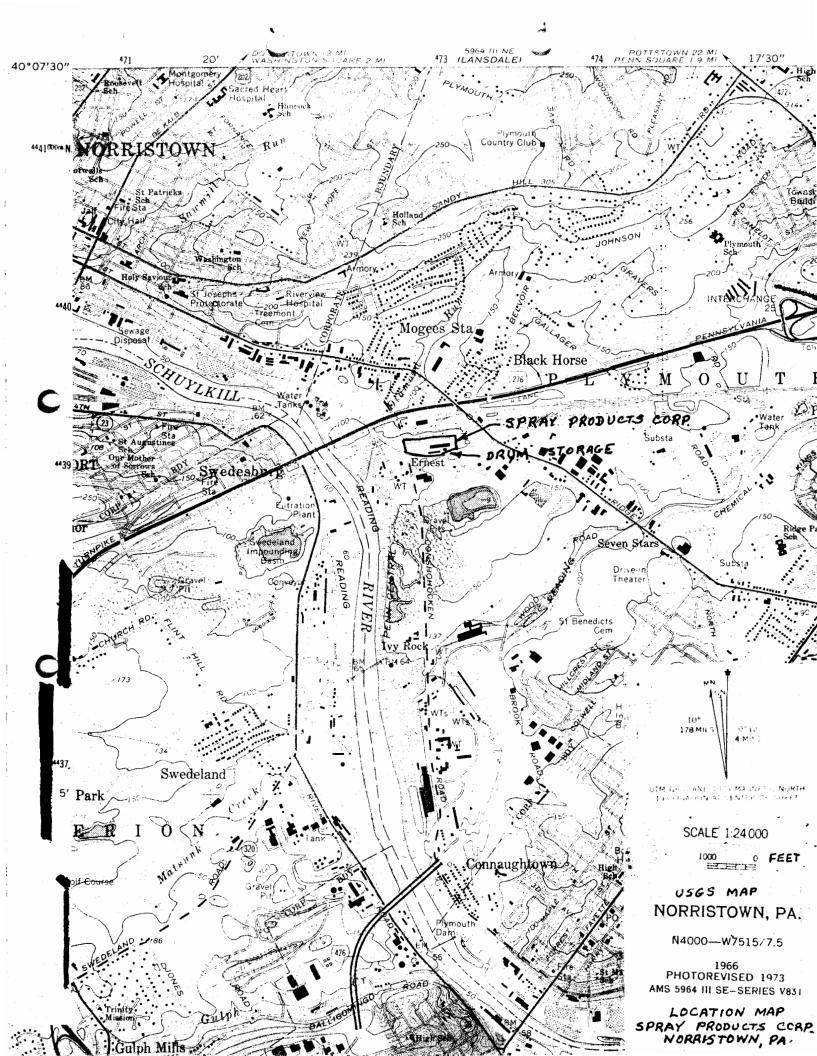


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VIII. OPERATOR INFORMATION.	A. NAME			B. Is the name listed in Item VIII-A also the
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false information, including the possibility of A. NAME & OFFICIAL TITLE (type or print)	Fine and Imprisonment. B. SIGNATURE			DATE SIGNED
ANDREW A. ORR -PRE	SIDENT OM	am Al	In 1	11/12/80



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C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characters. tics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed weste entered in column A estimate the quantity of that weste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODI
POUNDS	KILOGRAMSK
	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D PROCESSES

1. PROCESS CODES:

For listed hazardous weste: For each listed hazardous waste entered in column A select the code/s/ from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in til extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

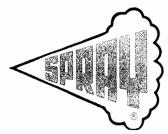
- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous weste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	A. EPA			C. UNIT		D, PROCESSES									
	HAZARD. WASTENO (enter code)			OF MEA- SURE (enter code)				1.	PR		ss co ter)	DES	5		2. PROCESS DESCRIPTION (if a code is not entered in D(1))
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X-3	D 0 0 1	100		P	7	7	3	1	5 6	30					
X-4	D 0 0 2				Ī	T	7	Ī	1			T			included with above

NOTE		his page before completing if	have	more	than 26	wastes				Form Approved OMB No. 158-S80004
ψP	ADD4	18 (enter from page 1) 27/6084 1	//		w .			D U P	TAL USE C	7/A C D U P
	THE STREET	ON OF HAZARDOUS WAST					2,70,53			
LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	OF	UNIT MEA URE enter ode))	1. PR	OCE!	SS CODE		D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
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Continued from the front.			
	ntinued)		
E. USE THIS SPACE TO LIST ADDITIONAL PRO	CESS CODES FROM ITEM D(1) ON PAG	E 5.	
1			
EPA I.D. NO. (enter from page 1)			_
EPAD042716084TAS			~
V. FACILITY DRAWING			
All existing facilities must include in the space provided on	page 5 a scale drawing of the facility <i>(see instruc</i>	tions for more detail)	
VI. PHOTOGRAPHS			
All existing facilities must include photographs (aeri			
treatment and disposal areas; and sites of future stor	age, treatment or disposal areas (see Instru	ctions for more de	
VII. FACILITY GEOGRAPHIC LOCATION			
LATITUDE (degrees, minutes, & seconds) LONG!	TUDE (degrees, minu	es, & secones)
[12] [18] [3]8		4006	$\perp \! \! \! \! \! \! \! \! \! \! \! \! \! \! \! \! \! \! \!$
VIII. FACILITY OWNER		72 - 74 75 76	77 79.
A. If the facility owner is also the facility operator as I	listed in Section VIII on Form 1 "General Lefer	mation" place on "Y"	' in the boy to the left and
skip to Section IX below.	isted in Section VIII on Form 7, General Prior	mation , place all -X	THE DOX TO THE IET AND
	ittadin Sastian VIII an Engal I annulate tha t	allawine itama	
B. If the facility owner is not the facility operator as I	steam Section VIII on Form 1, complete the		
EPERMETAL SET ALITE CARROLL SELECTION SELECTION OF SELECTION SERVICES AND	ITY'S LEGAL OWNER	2.	PHONE NO. (area code & n
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MIN IS	T	55 56	- 58 59 - 61 62 -
3. STREET OR P.O. BOX	4. CITY OR TOWN	5.ST.	6. ZIP CODE
F	G		
IX. OWNER CERTIFICATION	45 15 16	40 41 42	
I certify under penalty of law that I have personally	evenined and am familiar with the inform	ation submitted in	this and all attached
documents, and that based on my inquiry of those in			
submitted information is true, accurate, and comple			
including the possibility of fine and imprisonment.			
A. NAME (print or type)	B. SIGNATURE	C. DA	TE SIGNED ,
ANDREW A. ORR - PRESIDENT	Object All.	,,	1. 100
	STIMMENT MUM	11/	1/2/80
X, OPERATOR CERTIFICATION			•
I certify under penalty of law that I have personally	examined and am familiar with the inform	ation submitted in	this and all attached
documents, and that based on my inquiry of those in			
submitted information is true, accurate, and comple	te. I am aware that there are significant pe	nalties for submitti	ng false information,
including the possibility of fine and imprisonment.			
A. NAME (print or type)	B. SIGNATURE	C. DA	TE SIGNED



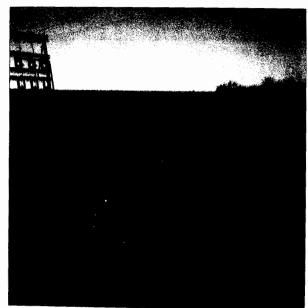
PRODUCTS CORPORATION

HOME OFFICE

P.O. BOX 737

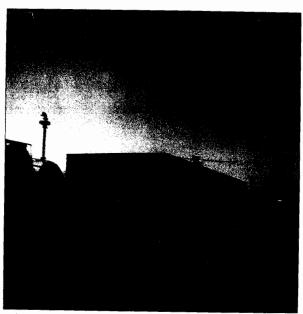
NORRISTOWN, PENNSYLVANIA 19404

TELEPHONE 215 277 1010 CABLE: SPRAYCO



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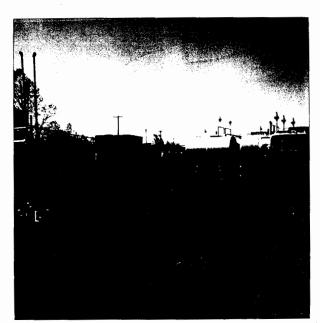
MAIN WHSE & OFFICES 11/12/80



SPRAY PRODUCTS CORP.

PACKAGING BLDG. 11/12/80

LOCKING WSW



SPRAY PRODUCTS CORP

- DRUM STORAGE AREA 11/12/80 - LECKING WSW